



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI

GOVERNOR

DAVID P. LITTELL

COMMISSIONER

May 9, 2007

Mr. Orlando Monaco
Department of Navy
Base Realignment and Closure
Program Management Office-Northeast
4911 South Broad Street
Philadelphia, PA 19112-1303

Re: Site 9 Response to Comments (RTCs) Monitoring Event 27
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

Pursuant to Section VI of the Naval Air Station, Brunswick, Maine Federal Facility Agreement (Oct 1990), as amended, the Maine Department of Environmental Protection (MEDEP) has reviewed the Responses to MEDEP Comments for Site 9, Monitoring Event 27 Report, September 2005, dated March 29, 2007, prepared by Environmental Chemical Corporation. Based on that review MEDEP has the following outstanding comments and issues.

A number of the RTCs include the promise of discussion at the next technical meeting. The next technical meeting is in June, please be sure to include these items on the agenda.

The comment numbers on the Navy's response are incorrect. The first two items in MEDEP's letter were bulleted observations that did not required not response. Please correct.

Original MEDEP comment 1 (Navy's #3) *This report contained some significant changes from the Long Term Monitoring Plan (LTMP) that were not explained in the text. The switch of locations MW-NASB-070, MW-NASB-076, MW-NASB-022, and MW-NASB-227 from Bi-Annual to Annual sampling status limited the dataset for this round, and does not reflect the LTMP. The SVOC and TAL Metals data were not discussed or tabulated for all the wells analyzed for those parameters. Please provide either the data or an explanation for these changes.*

Navy response: *Noted. The text will be revised to explain the LTMP optimization.*

Follow Up Comment: MEDEP accepts the Navy's response, however the Record of Decision for Site 9 requires monitoring in accordance with the current Long Term Monitoring Program, which was the August 1999 version which required bi-annual (twice per year) for these wells. A revision to this LTMP was issued in October 2005 which also required bi-annual (twice per year) sampling for these wells. The ROD requires MEDEP and EPA approval of the LTMP prior to implementation. The Optimization Proposal was dated November 2004. It did not supersede the LTMP, but was meant to be incorporated into it. CHECK WITH CHRISTINE-FIX

AUGUSTA

17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: (207) 760-3143

Original MEDEP comment 5 (Navy's #7): Section 1.1, Table 1-2 and Figure 1-3: As stated in the ME26 comments, the damaged staff gauge must be repaired or replaced as soon as possible but definitely before the next sampling event (Fall 2006). The text of Section 1.1 should note that the water elevations are estimated in the vicinity of the Lower Impoundment Pond due to the damaged staff gauge.

Navy's response: The text Section 1.1 will be revised to note that the water elevations are estimated in the vicinity of the Lower Impoundment Pond due to the damaged staff gauge.

Follow Up Comment: The gauging of this stream is part of the Long Term Monitoring Program to assess groundwater flow patterns. Please address whether the staff gauge was replaced or repaired. If it has not, then it must be repaired or replaced immediately.


Original MEDEP Comment 7 (Navy #9): Section 1.0, Table 1-1: "The Site 9 Long-Term Monitoring Plan..." Four wells are listed in Table 1-1 with an "Annual" sampling frequency. The ME26 report also quotes the 1999 LTMP, and those same wells are listed with a "Bi-Annual" frequency. MEDEP's review of the latest LTMP (October 2005) shows the locations listed as "Bi-Annual" as well. MW-NASB-076, which had a detection of vinyl chloride exceeding the MEG in the January 2006 low-flow sampling, may not be a good candidate for reduction to annual monitoring.

Navy response: Noted. The reference to the 1999 LTMP will be removed. The sampling frequency should be discussed at the next technical meeting.

The reference to 1999 LTMP must remain but with a referral to the 2004 Optimization Proposal.

Please contact me at (207) 287-7713 or claudia.b.sait@maine.gov, if you have any questions or comments.

Respectfully,



Claudia Sait
Project Manager-Federal Facilities
Bureau of Remediation & Waste Management

Cf: File
Chris Evans-MEDEP
Dale Mosher-BNAS
Christine Williams-EPA
Carolyn Lepage-Lepage Environmental
Al Easterday-ECC
Ed Benedikt
Jeff Donovan-ECC (email only)
Carol Warren-(email only)
Catherine Guido-ECC (email only)
Gina Calderone-EA (email only)
David Chipman (email only)